

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WILL CO. LTD. a limited liability company
organized under the laws of Japan,
Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka
FUNG KAM KEUNG, aka FUNG
KAMKEUNG, aka KUENG FUNG, aka
KEUNG KAM FUNG, aka KAM-KEUNG
FUNG, aka KEVIN FUNG, an individual;
FELLOW SHINE GROUP LIMITED, a foreign
company, and DOES 1-20, d/b/a AVGLE.COM,

Cause No. 3:20-cv-05666-RSL

CORRECTED REQUEST TO
RENOTE DEFENDANTS'
MOTION TO DISMISS FOR
LACK OF PERSONAL
JURISDICTION

AGREED REQUEST TO RENOTE MOTION

Subject to approval of this Court, Defendants Kam Keung Fung ("Mr. Fung") and Fellow Shine Group Limited ("FSG"), and Plaintiff Will Co. Ltd. hereby agree and request that defendants' Motion To Dismiss For Lack Of Personal Jurisdiction (Docket No. 23) be re-noted from January 29, 2021 to February 5, 2021. The purpose of this extension is based on the following:

1. Defendants had previously granted an extension of time for Plaintiff to respond to the motion as a courtesy to Plaintiff's counsel (see Dkt. # 25).

1 2. Plaintiff in this case had apparently requested and received documents from a
2 variety of third parties, some of which Plaintiffs utilized in their Opposition to Defendants'
3 Motion. These documents were not previously provided to Defendants.

4 3. Because Defendants had not seen or received any of the documents that had
5 been produced to Plaintiff prior to the filing of Plaintiff's Opposition, Defendants requested
6 that Plaintiff produce said documents and provide Defendants with a one-week courtesy
7 extension of time in order to permit Defendants time to review the materials and prepare an
8 adequate response to the same.

9 4. Counsel for Plaintiff has graciously agreed to Defendants' request that the
10 motion be re-noted to February 5, 2021.

11 5. This request to re-note the motion is made in accordance with such agreement
12 among Defendants' and Plaintiff's counsel and is not made for purposes of delay or any other
13 improper purpose.

14 Dated this 29th day of January, 2021.

15 Respectfully Submitted:

16 /s/ Philip Mann

17 Philip P. Mann, Esq. (WSBA No. 28860)
18 Mann Law Group PLLC
19 1420 Fifth Avenue, Suite 2200
20 Seattle, Washington 98101
21 Tel: 206-463-0900
22 Email: phil@mannlawgroup.com

23 /s/ Valentin Gurvits

24 Valentin D. Gurvits (pro hac vice)
25 Frank Scardino (pro hac vice)
26 BOSTON LAW GROUP, PC
27 825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: 617-928-1804
Facsimile: 617-928-1802
vgurvits@bostonlawgroup.com
frank@bostonlawgroup.com

1 /s/ Evan Fray-Witzer

Evan Fray-Witzer (pro hac vice)

2 CIAMPA FRAY-WITZER, LLP

20 Park Plaza, Suite 505

3 Boston, Massachusetts 02116

Telephone: 617-426-0000

4 Facsimile: 617-423-4855

5 Evan@CFWLegal.com

6 Attorneys for Defendants

7
8 /s/ Spencer Freeman

Spencer D. Freeman, WSBA No. 25069

9 1107 1/2 Tacoma Avenue South

Tacoma, Washington 98042

10 Telephone: 253-383-4500

Facsimile: 253-383-4501

11 sfreeman@freemanlawfirm.org

12 sierra@freemanlawfirm.org

13 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Philip P. Mann, hereby certify that on January 29, 2021, I caused a true and correct copy of the foregoing REQUEST TO RENOTE DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION to be filed in this Court's CM/ECF system which will send notice of such filing to all parties who have appeared in this matter.

DATED: January 29, 2021.

s/ Philip P. Mann
Philip P. Mann, WSBA No. 28860
Mann Law Group pllc